

### **REMARKS/ARGUMENTS**

Applicants received the Office Action dated July 17, 2006, in which the Examiner: 1) rejected claims 1-20 under 35 U.S.C. § 112, 1<sup>st</sup> paragraph, as allegedly failing to comply with the written description requirement; 2) rejected claims 1-9 and 11-20 under 35 U.S.C. § 102(b) as anticipated by Monestere III, (U.S. Pub. No. 2003/0041044, hereinafter "Monestere"); and 3) rejected claim 10 under 35 U.S.C. § 103(a) as obvious over Monestere in view of Garcia et al. (U.S. Pub. No. 2005/0256766, hereinafter "Garcia"). With this Response, Applicants amend claims 1, 3, 8, 15, and 20.

#### **I. REJECTIONS UNDER 35 U.S.C. § 112, 1<sup>ST</sup> PARAGRAPH**

Applicants are unclear as to which claims are being rejected under § 112, first paragraph. Page 2 of the Office Action states that "claim 1-20 are rejected under 35 U.S.C. 112, first paragraph." However, in articulating the reasons for why the claims are rejected under § 112, first paragraph, the Examiner referred to an alleged problem only with regard to dependent claims 3, 15, and 20. Thus, Applicants are unclear whether the Examiner is rejecting all claims under § 112, or just claims 3, 15, and 20. If the Examiner intended to reject all claims under § 112, Applicants respectfully request the Examiner to specify what the specific alleged problems are with all claims so that the Applicants can address the problems. At any rate, Applicants have amended claims 3, 15, and 20 to address the Examiner's § 112 concerns of those claims.

#### **II. THE ART REJECTIONS**

Applicants amend claim 1 to also require "selecting a mapping based on the at least one metric" and "invoking the mapping to create a search query." Applicants do not find this combination of limitations in the art of record. The Examiner seems to analogize a search criterion and a search query in Monestere to the claimed "metric" and "mapping," respectively. However, Applicants respectfully submit that the Examiner's analysis is logically flawed when comparing the teachings of Monestere to claim 1, particularly as claim 1 has been amended. For example, a search query of Monestere is not selected based on a search criterion, and the search query naturally is not invoked to create the

search query, as would be required by claim 1. No other art of record satisfies the deficiencies of Monestere. For either or both of these reasons, claim 1 and all claims dependent thereon are allowable.

The same or similar amendments have been made to independent claim 8. Thus, claim 8 and claims dependent thereon are patentable for much the same reason as claim 1.

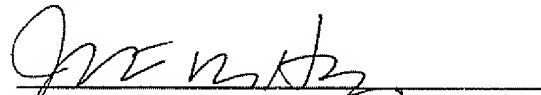
Claim 12 requires "an interpreter that executes search queries generated from mappings." The Examiner seems to indicate that Monestere's search queries are akin to the claimed "mappings." If that were a fair assessment of the art, then the claim, when read against Monestere would require executing a search query from a search query, a logically inconsistent result. No other art of record satisfies this deficiency of Monestere. For at least this reason, claim 12 and all claims dependent thereon are allowable.

Claim 18 is patentable for much the same reason as for claim 12. Thus, claim 18 and its dependent claims are in condition for allowance.

### III. CONCLUSION

Applicants respectfully request reconsideration and that a timely Notice of Allowance be issued in this case. It is believed that no extensions of time or fees are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 C.F.R. § 1.136(a), and any fees required (including fees for net addition of claims) are hereby authorized to be charged to Hewlett-Packard Development Company's Deposit Account No. 08-2025.

Respectfully submitted,



Jonathan M. Harris  
PTO Reg. No. 44,144  
CONLEY ROSE, P.C.  
(713) 238-8000 (Phone)  
(713) 238-8008 (Fax)  
ATTORNEY FOR APPLICANTS

HEWLETT-PACKARD COMPANY  
Intellectual Property Administration  
Legal Dept., M/S 35  
P.O. Box 272400  
Fort Collins, CO 80527-2400